

PSAP Outreach Script

INTRO: Hello, this is calling regarding VoIP (Voice over Internet Protocol) E911 deployment in your area on behalf of Vonage_ (VSP). Have I reached the PSAP, (PSAP Name)? I would like to confirm your PSAP's FCC ID # ? (If FCC ID unknown to PSAP, not an issue) Are you the proper contact to discuss this VoIP deployment? Can I have your name and title for our records please? Is there a direct number where you can be reached?
Have you received our VoIP Welcome Kit? Are you familiar with VoIP?
<u>VoIP</u> : Voice over Internet Protocol (VoIP) is a technology that allows people to place local and long-distance phone calls over the internet. It allows the consumer to take her or her phone from one location to another. A consumer can plug in their VoIP phone wherever internet access is available.
FCC mandate: The FCC has directed VoIP carriers to provide enhanced 9-1-1 service to all of their customers before the end of November, 2005. You do not have to submit a request letter to Vonage, as the FCC's directive automatically requires that they deployed 9-1-1 services in your area.
Vonage is working with 9-1-1 System Service Providers (SSPs) to ensure full connection and the integration of VoIP elements into the Selective Router (SR) along with the routing of Automatic Location Information (ALI) and Automatic Number Identification (ANI) through industry leading VoIP Position Centers (VPCs) that will route E9-1-1 calls to the appropriate PSAP.
VolP E911 Solution:
An E9-1-1 call placed using VoIP service will be routed to the PSAP serving the subscriber's self-identified address using a pseudo Automatic Number identification (pANI) referred to for VoIP as an ESQK (Emergency Service Query Key).
The ESQK is used to: • Route the call to the appropriate PSAP • Relay the Automatic Location Information (ALI) query to the appropriate third-party ALI database
The Vonage i2 compliant solution will provide operators with the callback number and subscriber provided location information for their customers who dial 9-1-1.
I'd like to ask you a few questions to gather the necessary information required to prepare for your VoIP E911 deployment:
(LEC) Are you are still working with the same LEC,, correct? (or) What LEC are you currently using for your 9-1-1 trunking?(SR) And what is the name of the LEC's Selective Router you are connected to?
(or) If you don't know, whom should we contact to verify this information? (ALI) Do you know the name of the ALI nodes that your PSAP is connected to? (or) If you don't know, whom should we contact to verify this information?



(Shell Record)

Vonage requires the use of a VoIP MSAG, which will allow us to build VoIP Shell Records with associated ESQKs for your PSAP in the ALI database. These shell records will be used to deliver VoIP caller location information to your PSAP much the same way as wireless call processing.

Have you already contacted your LEC to request an MSAG or We recommend that you use the following format for your VoIP MSAG: Street Name: VOIP 911 CALLER Community: (Same as your Wireless Record, usually your PSAP Name)
ESN: (see next question)
(ESN) What ESN will you be using in support of VoIP calls? Keep in mind that Vonage uses the PSAF shape file for routing and only one ESN per PSAP is needed. In the near future Vonage will deliver the ESN associated with the subscriber provided MSAG valid address with the ALI response. In the event we are unable to validate an address against the MSAG the ESN you provide as a default will display.
VoIP ESN: Is this the same as your wireless ESN, or did you work with your LEC to create a VoIP specific ESN?
(Shape file) If TCS has shape file already: Have there been any changes to your PSAP's jurisdictional boundarywill you be using the same PSAP boundary for VoIP that you do for Wireless? Yes/No
If TCS does not have shape file, or the PSAP is making changes to it. We will need the following information from you in order to build a new PSAP boundary in orderabase.
 A shape file (consisting of at least a .dbf file, a .shp file and a .sbn file). Projection – The projection of the data (Stateplane, UTM, etc) Datum – (NAD83, NAD27, etc) A written description of the contents of the shape file.
(CRN) Default Number Please provide us with a 10-digit default number for alternative call delivery to your PSAP to be used in the event the system is unable to deliver the call according to the route established by th native 9-1-1 network. This number will be used for this purpose <u>only</u> , and NOT for the general delivery of E9-1-1 calls (If PSAP opts NOT to provide a CRN, please make a note of this request)
CLOSING I want to recap the information you provided. (repeat the information gathered above)
The following information is still outstanding is: (information unconfirmed above). (If needed-1 will contact you in 5 days to obtain this outstanding information. What is the best time of day to reach you.

A Deployment Manager will be following up with you to schedule your VoIP testing. Will you be our contact for scheduling testing? (If not, whom shall we contact? Record Name and Phone #) Thank you for your time. Have a great day.

November 21, 2005

Mr. Stephen R. Seitz Vice President of 9-1-1 Regulatory Affairs Vonage 2147 Route 27 Edison, NJ 08817

Re: Vonage VoIP 9-1-1/E9-1-1 Implementation Efforts

Dear Mr. Seitz:

In my capacity as President of Wisconsin NENA I am writing to recognize and applaud Vonage's efforts to work with us to implement E9-1-1 service for Vonage customers and to support Vonage's request for an extension of the current timeframes for the full E9-1-1 implementation in Wisconsin.

Even prior to the issuance of the VoIP 9-1-1E9-1-1 Order, Vonage had been diligently working with public safety entities towards a nationwide rollout of E9-1-1 service. Following the Order, Vonage stepped up its efforts to work hand-in-hand with the public safety community.

Vonage has provided "PSAP kits" to PSAPs in Wisconsin, and to other public safety entities across the country, in an effort to inform PSAPs of the technical issues involved with VoIP 9-1-1/E9-1-1 interconnection, and to demonstrate Vonage's willingness to work with PSAPs to implement the FCC's VoIP 9-1-1/E9-1-1 requirements for its customers. I've have personally worked with Vonage and Wisconsin NENA to ensure that the planning and turn-up of VoIP 9-1-1/E9-1-1 services proceeds smoothly and as expeditiously as possible. I very much appreciate the resources and time that Vonage has dedicated to working with the public safety community.

No.4925 P. 2

120 days is an aggressively short amount of time to implement VoIP 9-1-1/E9-1-1, and while I support the FCC's desire for immediate action, I am concerned that the parties not act in haste to roll out an E9-1-1 service that may not meet our standards or the needs of the citizens we serve.

Based on the effort Vonage has already made to 9-1-1/E9-1-1, I am confident that Vonage will do everything it can to migrate as many of its customers as possible to 9-1-1/E9-1-1. Working with Vonage in Wisconsin we have developed a forward looking path to compliance.

I do not believe that Vonage should be penalized for their efforts and circumstances that are beyond its control. Therefore, I'm requesting that Vonage should be extended more time to meet the implementation deadline in Wisconsin.

I and the Wisconsin PSAPs look forward to continuing to work with Vonage to give your customers, and our citizens, 9-1-1/E9-1-1 access under a mutually agreeable implementation schedule that meets the FCC's substantive requirements, and our respective technological needs.

Sincerely,

Alan L. Blencoe, President

Man & Blenave

Wisconsin NENA

333 Vine St

La Crosse, WI 54601

Blencoe.al@co.la-crosse.wi.us

608-785-5955

LA CROSSE COUNTY EMERGENCY SERVICES

Courthouse & Law Enforcement Center 333 Vine Street La Crosse, Wisconsin 54601-3296

PUBLIC-SAFETY COMMUNICATIONS

9-1-1

Administrative; (608) 785-9634 FAX: (608) 785-9858 Jeanette A. Lenser

EMERGENCY MANAGEMENT
Kelth S. Butler

Coordinator

Administrative: (608) 789-4811 FAX: (608) 785-5741

November 21, 2005

Mr. Stephen R. Seitz Vice President of 9-1-1 Regulatory Affairs Vonage 2147 Route 27 Edison, NJ 00817

Re: Vonage VoIP 9-1-1 Implementation Efforts

Dear Mr. Seitz:

In my capacity as Administrator of a Wisconsin PSAP I am writing to support Vonage's request for an extension of the current time frames for the full E9-1-1 implementation in Wisconsin.

Vonage has demonstrated a willingness to work with PSAP's to implement the FCC's VoIP9-1-1/E9-1-1 requirements for its customers and is working with Wisconsin PSAP's to ensure that the planning and implementation of VoIP 9-1-1/E9-1-1 services proceed as smoothly and expeditiously as possible.

Based on the effort Vonage has already made to 9-1-1/E9-1-1, I am confident that Vonage will do everything it can to migrate as many of its customers as possible to 9-1-1/E9-1-1. In Wisconsin, Vonage has developed a forward looking path to compliance.

I do not believe that Vonage should be penalized for their efforts and circumstances that are beyond its control. Therefore, I support Vonage's request to extend the deadline for implementation in Wisconsin.

Sincerely,

Jeanette Lenser, Administrator

La Crosse County Emergency Services

333 Vine St.

La Crosse, WI 54601

lenser.jeanette@co.la-crosse.wi.us

608-785-9860

STATE OF MONTANA



Department of Administration INFORMATION TECHNOLOGY SERVICES DIVISION



November 23, 2005

Mr. Stephen R. Seitz Vice President of 9-1-1 Regulatory Affairs Vonage 2147 Route 27 Edison, NJ 08817

Re: Vonage VoIP 9-1-1E9-1-1 Implementation Efforts and Path Forward

Dear Mr. Seitz:

In my capacity as the 9-1-1 Program Manager for the State of Montana, I am writing to recognize Vonage's efforts to work with us to implement E911 service for Vonage customers in Montana.

Vonage has made a good faith effort and substantial progress has been made to comply with the FCC order in Montana. Extension requests with State specific plans and deployment schedules should be accepted as commitment to compliance. Based on the level of effort Vonage has already devoted to 9-1-1/E9-1-1, I am confident that Vonage will do everything it can to migrate as many of its customers as possible to 9-1-1/E9-1-1.

As a State Manager of a small rural state, I am concerned with timely deployment and access to 9-1-1 service for all subscribers regardless of the number of subscribers.

Montana Code Annotated 10-4-201 requires the 9-1-1 fee to be imposed on 9-1-1 accessible services. The collection and remittance of this fee should not be impacted by any extension granted by the FCC.

I look forward to continuing to work with Vonage to give your customers, and our citizens, ubiquitous 9-1-1/E9-1-1 access under a mutually agreeable implementation schedule that meets the FCC's requirements.

Sincerely,

Becky Berger

Becky Berger State of Montana 9-1-1 Program Manager

cc: Mark Trierweiler, Vonage Director of 911 Relations

Greenwald, Eliot

From: Finn, Tamar

Sent: Monday, November 28, 2005 9:44 AM

To: Greenwald, Eliot

Cc: Wilhelm, William; Quill, Edward

Subject: Fw: E-911

Importance: High

Sent from my BlackBerry Wireless Handheld

----Original Message----

From: Stephen Seitz <Stephen.Seitz@vonage.com>

To: Finn, Tamar <TEFinn@SWIDLAW.com>

Sent: Mon Nov 28 09:43:25 2005

Subject: Fw: E-911

----Original Message----

From: Chris Mizera To: Stephen Seitz

Sent: Mon Nov 28 08:40:03 2005

Subject: FW: E-911

Here is another one...

From: The Werners [mailto:mlwcfw05@illicom.net]

Sent: Monday, November 28, 2005 7:35 AM

To: Chris Mizera Subject: E-911

Chris,

At Ford County 911, we appreciate all of the hard work and effort Vonage has put forth working with our agency and Verizon to deploy E911. We will continue to work with Vonage in order to receive VoiP E911 calls through the native 911 system and deliver this service to our citizens.

Sincerely,

Charles F. Werner, Ford County

911 coordinator.

Greenwald, Eliot

Subject:

FW: Letter of appreciation

----Original Message----

From: Phil Kubisztal [mailto:pkubisztal@lagrangepark.org]

Sent: Monday, November 28, 2005 1:19 PM

To: Chris Mizera

Subject: Letter of appreciation

Christopher P. Mizera Regional Director E911 Relations P.O. Box 231 Raymond, IL 62560

Dear Chris:

I wanted to send you this quick e-mail to thank you and Vonage for the hard work and effort that has been put forth in working with our agency to deploy VoIP E911 service. Vonage's early partnership with our agency has assisted us in understand this technology and addressing the concerns that we all have over the efficient routing of these emergency calls.

We will continue to work with you and Vonage in the future to effectively receive VoIP E911 calls through the native 911 system and deliver this emergency service to our citizen customers.

Sincerely,

Philip J. Kubisztal, Deputy Chief LaGrange Park Police Department 447 N. Catherine Avenue LaGrange Park, IL 60526 pkubisztal@lagrangepark.org Voice (708) 352-2151 Fax (708) 354-9223



The Commonwealth of Massachusetts STATEWIDE EMERGENCY TELECOMMUNICATIONS BOARD 1380 Bay Street ~ Taunton, MA 02780-1088 Tel: 508-828-2911 ~ TTY: 508-828-4572 Fax: 508-828-2585



MITT ROMNEY
Governor

KERRY HEALEY
Lt. Governor

EDWARD A. FLYNN Secretary of Public Safety

PAUL J. FAHEY
Executive Director

November 22, 2005

Stephen R. Seitz, Vice President 9-1-1 Regulatory Affairs Vonage 2147 Route 27 Edison, NJ 08817

RE: Vonage VoIP 9-1-1/E9-1-1 Implementation Efforts

Dear Mr. Seitz:

I am writing this letter to recognize and applaud the efforts of Vonage to work with the Massachusetts Statewide Emergency Telecommunications Board (SETB) to implement 9-1-1/E9-1-1 service for your customers, and to support your request for an extension of the current timeframes for the full 9-1-1/E9-1-1 implementation.

In June 2005, the Federal Communications Commission (FCC) released its VoIP 9-1-1/E9-1-1 Order concerning emergency service requirements. At that time, Vonage had been working with public safety entities, including the SETB, towards a nationwide rollout of 9-1-1/E9-1-1 service. Following the Order, Vonage stepped up your efforts; you actively participated in Massachusetts forums to explain your technological solution and address any concerns. As a result of Vonage and the SETB's proactive approach to meeting the FCC Order, the Commonwealth of Massachusetts became one of the first states in the U.S. to fully deploy Vonage's VoIP 9-1-1/E9-1-1 solution on November 14, 2005 – two weeks ahead of the deadline!

Based on the level of effort Vonage devoted to 9-1-1/E9-1-1 in Massachusetts, we are confident that you will do everything you can to migrate as many customers as possible to 9-1-1/E9-1-1. Working with Vonage in Massachusetts, we were able to develop a forward looking path to compliance. We do not believe that Vonage should be penalized for their efforts and circumstances that are beyond your control. Therefore, we believe that Vonage should be extended more time to meet the implementation deadline in other parts of the United States. We look forward to our ongoing relationship with Vonage to guarantee your customers -- and our residents -- ubiquitous 9-1-1/E9-1-1 access under a mutually agreeable implementation schedule that meets the FCC's substantive requirements, and our respective technological needs.

Sincerely,

PAUL J. FAHEY Executive Director

Message Page 1 of 1

Greenwald, Eliot

From: Finn, Tamar

Sent: Friday, November 18, 2005 12:17 PM

To: Sharon O'Leary
Cc: Wilhelm, William

Subject: FW: CITY of CHICAGO ON HOLD -- SEE CORRESPONDENCE FW: Vonage E911

Deployment

Importance: High

From: JAMES G. ARGIROPOULOS [mailto:jargiropoulos@cityofchicago.org]

Sent: Thursday, November 17, 2005 7:25 PM

To: Chris Mizera

Subject: Re: Vonage E911 Deployment

Chris,

I am working with the Intergovernmental Affairs office of the City regarding VOIP service. As of this mail we have not agreed to allow any VOIP provider access to our 9-1-1 system. Until I receive an official ruling we are on hold.

Thank you,

Jim

Greenwald, Eliot

From:

Finn, Tamar

Sent:

Saturday, November 19, 2005 8:13 PM

To:

Greenwald, Eliot

Subject:

Fw: Compliance report example, FW: Pennsylvania Vonage deployment

Sent from my BlackBerry Wireless Handheld

----Original Message----

From: Stephen Seitz <Stephen.Seitz@vonage.com>

To: Finn, Tamar <TEFinn@SWIDLAW.com>

Sent: Sat Nov 19 15:33:37 2005

Subject: Compliance report example, FW: Pennsylvania Vonage deployment

On example for the PSAP process list. We have filled out Philadelphia's questionnaire and have not heard back from Mr. James.

Steve

Stephen Seitz | Vice President 9-1-1 Regulatory Affairs | Vonage | t:848.248.1809 |

From: Joseph.James@phila.gov [mailto:Joseph.James@phila.gov]

Sent: Friday, November 11, 2005 12:24 PM

To: Angel Arocho; Michael Athay; Robert Sutton; Frank Punzo

Cc: Stephen Seitz; John Cummings

Subject: Re: Pennsylvania Vonage deployment

Mr. Arocho,

You should not proceed with any deployment or testing in the city/county of Philadelphia. The certification for providing E911 process requires all service providers, especially Vonage, complete the city questionnaire for approval before any testing is schedule by Philadelphia Police Department.

Joseph James

Deputy Commissioner

Department of Public Property

(tn) 215-686-4444

---- Original Message ----

From: "Angel Arocho" [Angel.Arocho@vonage.com]

Sent: 11/11/2005 11:10 AM

To: Joseph James

Cc: Stephen Seitz" <Stephen.Seitz@vonage.com>; John Cummings" <John.Cummings@vonage.com> Subject: RE: Pennsylvania Vonage deployment

Mr. James,

Below is additional information regarding the Level 3 circuits Vonage will utilize to deliver E911 calls. I believe all the information you needed has been provided. Based on our previous communication Vonage will continue to move forward with deployment, testing and turn up. Please contact me if you have any questions.

CLLI

TGID

TSC

Signaling

DS0 QUANTITY

PHLAPALODS1

14402

91114402

SS7

2

PHLAPAMKDS0

14393

91114393

SS7

2

Thanks for your help,

Angel A. Arocho

Director of Regional 911

Office: 732.231.6741

Fax: 732.231.6155

angel.arocho@vonage.com

----Original Message----

From: Angel Arocho

Sent: Thursday, November 03, 2005 4:30 PM

To: Joseph.James@phila.gov

Cc: Stephen Seitz; John Cummings

Subject: RE: Pennsylvania Vonage deployment

Importance: High

Mr. James,

I have not heard back from you regarding my voice messages. In an attempt to be responsive to your information request, I've included our support contact information and network solution layout for your PSAP's use. I believe this material answers the questions posed by your questionnaire. Please contact me to discuss any further questions. Vonage is open to meeting with you if you feel that would better address any PSAP concerns.

We would like to move forward with our deployment for the citizens of Philadelphia, and your feedback and assistance would be appreciated.

Thanks,

Angel A. Arocho

Director of Regional 911

Office: 732.231.6741

Fax: 732.231.6155

angel.arocho@vonage.com

----Original Message----

From: Joseph.James@phila.gov [mailto:Joseph.James@phila.gov]

Sent: Monday, October 17, 2005 3:42 PM

To: Angel Arocho

Subject: RE: Pennsylvania Vonage deployment

Mr Arocho,

Thanks for your response as well but I don't need you to contact me just

submit the information so that proper testing can be done to ensure your network is in compliance before offering service in our county.

Joseph James

Deputy Commissioner

Department of Public Property

(tn) 215-686-4444

(fax) 215-686-4583

"Angel Arocho"

<Angel.Arocho@von

To:

<Joseph.James@phila.gov>

age.com>

cc:

Subject: RE: Pennsylvania Vonage

deployment

10/17/2005 03:36

PΜ

Mr. James,

Thanks for your response. We've also created a website specifically for PSAPs to share vital information. You can learn more about our E9-1-1 plans as well as obtain contact information and additional resources.

http://vonage.com/PSAPcenter/

I will contact you to discuss more.

Regards,

Angel Arocho

----Original Message----

From: Joseph.James@phila.gov [mailto:Joseph.James@phila.gov]

Sent: Monday, October 17, 2005 10:24 AM

To: Angel Arocho

Subject: Re: Pennsylvania Vonage deployment

Mr. Arocho,

If your company is really interested in fulfilling its E911 obligations please comply with the city/counties certification

(See attached file: 911 Surcharge Guidelines.doc) (See attached file: 911 Questionnaire9.7.99.doc) (See attached file: Service Provider E9-1-1 Protocols.doc)

Joseph James

Deputy Commissioner

Department of Public Property

(tn) 215-686-4444

(fax) 215-686-4583

<Angel.Arocho@von To: "Angel Arocho"</pre>

<Angel.Arocho@vonage.com>

age.com>

cc:

Subject: Pennsylvania

Vonage deployment

10/12/2005 12:21

AM

Dear 9-1-1 Coordinator,

Vonage has been moving quickly to bring Enhanced 9-1-1 service to our VoIP

subscribers. From the "Welcome Kits" mailed to the data gathering and the

provisioning things are progressing well. Vonage wants to make sure open

lines of communication are maintained with to the Pennsylvania Public Safety Community. Please don't hesitate to contact me should you have any

questions regarding our VoIP deployment.

Regards,

Angel A. Arocho

Director of Regional 911

Office: 732.231.6741

Fax: 732.231.6155

angel.arocho@vonage.com



November 10, 2005

VIA CERTIFIED MAIL

Mr. Steven Makky 9-1-1 Coordinator St. Charles County Dispatch 301 N. Second Street, Room 280 St. Charles, MO 63301

Re:

Vonage VoIP E911 Implementation Efforts

Dear Mr. Makky:

On behalf of Vonage America Inc. ("Vonage"), I am writing to you concerning Vonage's efforts to implement E911 service for Vonage customers in St. Charles County (including St. Charles County Dispatch, O'Fallon Police Dept., Wentzville Police Dept., St. Peters City Police Dept. and St. Charles Police Dept.). As you know, the FCC's VoIP E911 Order imposes extensive E9-1-1 connectivity requirements on providers of "interconnected" VoIP services such as Vonage. Specifically, Vonage and other interconnected VoIP providers must route customer 9-1-1 calls to appropriate PSAPs using the traditional 9-1-1 infrastructure, and provide PSAPs with customer callback number and registered location information by November 28, 2005.

On September 20, 2005, Vonage sent a PSAP kit to St. Charles County Dispatch. This kit was designed to inform PSAPs of the technical issues involved with VoIP E9-1-1 interconnection, and to demonstrate Vonage's willingness to work with PSAPs to implement the FCC's VoIP E9-1-1 requirements for its customers. On October 4 and November 9, 2005, Vonage representatives followed up with St. Charles County Dispatch to discuss the information provided in the kit and to discuss working with St. Charles County Dispatch to implement the FCC's VoIP E9-1-1 requirements. Unfortunately, on November 9, Vonage learned that St. Charles County Dispatch refuses to work with Vonage to implement E9-1-1 routing, database access, and emergency calling support for Vonage customers until Vonage pays jurisdiction specific 9-1-1 fees.

See IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers, First Report and Order and Notice of Proposed Rulemaking, WC Docket Nos. 04-36 & 05-196, FCC 05-116 (rel. June 3, 2005) ("VoIP E911 Order").

The "PSAP kit" is available on Vonage's website at: http://www.vonage.com/psapcenter/.

In the *VoIP E911 Order*, the FCC recognized that some states did not have 9-1-1 fee collection mechanisms in place that would apply to VoIP providers.³ Nevertheless, it required interconnected VoIP service providers to implement E9-1-1 without mandating PSAP or carrier cost recovery as a prerequisite to implementation.⁴ Recognizing that "120 days is an aggressively short amount of time" to implement VoIP E9-1-1, the FCC found that "the threat to public safety if we delay further is too great and demands near immediate action."⁵ This need for immediate action supports the FCC's determination to mandate E9-1-1 implementation prior to establishment of a direct cost recovery mechanism for PSAPs.

While we are willing to work with the appropriate state officials and representatives to resolve issues regarding appropriate funding mechanisms for VoIP E9-1-1, we do not believe that such discussions should derail the substantial progress Vonage is making to meet the FCC's mandate and deny customers in St. Charles County the E9-1-1 service they deserve. As such, Vonage, again, respectfully requests the cooperation of St. Charles County Dispatch (and other PSAPs in the county) in implementing a VoIP E9-1-1 solution for the citizens in St. Charles County. Simply putting a halt to implementation while we resolve specific differences over fee structures, mechanisms and collection points puts the welfare of your local citizens at risk, and directly contravenes the requirements of and the purposes behind the FCC's VoIP E911 Order. In light of the aforementioned, we hope that St. Charles County Dispatch reconsiders its position on VoIP E9-1-1 implementation. Vonage wants to work cooperatively with St. Charles County Dispatch to give our customers, and your citizens, ubiquitous E9-1-1 access. Please contact us as soon as possible to discuss these matters, so that we can develop an implementation schedule that meets the FCC's requirements, and our respective technological needs.

Sincerely,

Chris Ternet Director, 9-1-1 Fees VONAGE

cc: R.D. Porter, ENP, State of Missouri-Office of Administration

³ See VoIP E911 Order, ¶ 52.

As opposed to wireless E9-1-1 implementation, where the FCC specifically required PSAP cost recovery as a pre-condition of 9-1-1 implementation, no such prerequisite has been made for VoIP E9-1-1 implementation. See, e.g., Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 94-102, ¶ 34 (rel. July 26, 1996).

See VoIP E911 Order, ¶ 37.

NATIONAL EMERGENCY NUMBER ASSOCIATION

P. O. Box 82236 Lafayette, LA 70598-2236

Telephone: (337) 291-5060 Fax: (337) 291-5080

NOVEMBER 10, 2005

Sherri Griffith Powell Vonage – Regional Director, E9-1-1 2147 Route 27 Edison, NJ 08817

Re: Vonage VoIP E911 Implementation Efforts

Dear Sherri;

Thank you for your inquiry on behalf of Vonage America Inc. regarding the Enhanced 9-1-1 services our agency provides. As you are aware, we remain highly committed to preserving public safety and look forward to working with companies such as Vonage and other interconnected Voice over Internet Protocol ("VoIP") service providers to meet the E9-1-1 obligations imposed by the Federal Communications Commission for VoIP services as rapidly as possible. Accordingly, we appreciate Vonage's efforts to meet with our Staff and are encouraged by Vonage's Public Safety Answering Point outreach program.

Despite our interest in deploying VoIP E9-1-1 Service as soon as possible, we are currently working on disaster recovery efforts in response to the extreme conditions created by Hurricane's Katrina and Rita. The hurricane's caused significant damage to our emergency response systems and capabilities. While we are working to rebuild necessary infrastructure and bring public safety systems back into full operational status rapidly, we expect that it will take at least an additional 180 days before those processes will be complete, after which time we would welcome additional discussions with Vonage.

We look forward to working with Vonage and other VoIP providers to complete E9-1-1 service deployment as soon as possible once our recovery efforts have been completed. In the meantime, if you have questions regarding deployment or wish to discuss these issues further, please do not hesitate to contact me at 1-800-820-7138.

Yours Truly,

Dan W. Smith

Don W. Smith, La NENA President



National Emergency Number Association

Mississippi Chapter of NENA 217 BROAD ST COLUMBIA MS 34929

November 21, 2005

Sherri Griffith Powell Vonage – Regional Director, E9-1-1 2147 Route 27 Edison, NJ 08817

Re:

Vonage VoIP E911 Implementation Efforts

Dear Sherri:

Thank you for your inquiry on behalf of Vonage America Inc. regarding the Enhanced 9-1-1 services our agency provides. As you are aware, we remain highly committed to preserving public safety and look forward to working with companies such as Vonage and other interconnected Voice over Internet Protocol ("VoIP") service providers to meet the E9-1-1 obligations imposed by the Federal Communications Commission for VoIP services as rapidly as possible. Accordingly, we appreciate Vonage's efforts to meet with our Staff and are encouraged by Vonage's Public Safety Answering Point outreach program.

Despite our interest in deploying VoIP E9-1-1 Service as soon as possible, we are currently working on disaster recovery efforts in response to the extreme conditions created by Hurricane Katrina]. The hurricane caused significant damage to our emergency response systems and capabilities. While we are working to rebuild necessary infrastructure and bring public safety systems back into full operational status rapidly, we expect that it will take at least an additional 180 days before those processes will be complete, after which time we would welcome additional discussions with Vonage.

We look forward to working with Vonage and other VoIP providers to complete E9-1-1 service deployment as soon as possible once our recovery efforts have been completed. In the meantime, if you have questions regarding deployment or wish to discuss these issues further, please do not hesitate to contact me at 601-736-6466.

Yours Truly,

Donna McKenzie Mississippi Chapter President



AK Associates Inc.

9-1-1 Specialists

7 Independence Ave Derry, New Hampshire 03038

November 22, 2005

Sherri Griffith Powell Vonage – Regional Director, E9-1-1 2147 Route 27 Edison, NJ 08817

Re: Vonage VoIP E911 Implementation Efforts

Dear Sherri,

Thank you for your inquiry on behalf of Vonage America Inc. regarding the Enhanced 9-1-1 services our agency provides. As you are aware, we remain highly committed to preserving the public safety and look forward to working with companies such as Vonage and other interconnected Voice over Internet Protocol ("VoIP") service providers to meet the E9-1-1 obligations imposed by the Federal Communications Commission for VoIP services as rapidly as possible. Accordingly, we appreciate Vonage's efforts to meet with our Staff and are encouraged by Vonage's Public Safety Answering Point outreach program.

Despite our interest in deploying VoIP E9-1-1 Service as soon as possible, the Baker County Emergency Operations Center (which serves a county of about 22,500) is in the process of installing a new on-site selective router. Therefore, we are requesting that Vonage extends the initial deployment from the November 28th deadline to December 31, 2005. Baker County has completed the installation of our on-site 9-1-1 selective router by then and be ready to deploy Vonage VoIP. AK Associates Inc. is Baker County's 9-1-1 equipment maintenance provider and will be configuring the VoIP implementation as we have in other areas throughout the country.

We look forward to working with Vonage and other VoIP providers to complete E9-1-1 service deployment as soon as possible after our system modification activities have been completed. In the meantime, if you have questions regarding deployment or wish to discuss these issues further, please do not hesitate to contact me at 603-434-4217.

Yours Truly,

Arthur E. Kraus

Arthur E. Kraus, Executive VP AK Associates Inc.